

REMARKS

Claims 1-12 are pending in this application. By this Amendment, claims 1, 4, 7 and 10-12 are amended. No new matter is added. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner LaRose in the April 17, 2007 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

The Office Action objects to claims 10-12, asserting that the term "system" should be recited consistently in claims 10, 11 and 12. The foregoing amendments obviate this rejection. Thus, Applicants respectfully request that the objections to claims 10-12 be withdrawn.

The Office Action rejects claims 4-9 under 35 U.S.C. §103(a) as being unpatentable over Barthel (U.S. Patent No. 6,731,800); and rejects claims 1-3 and 10-12 under 35 U.S.C. §103(a) as being unpatentable over Barthel in view of Zhu (U.S. Patent No. 6,301,386). Applicants respectfully traverse these rejections.

Applicants respectfully assert that Barthel and Zhu, either individually or in combination, fails to disclose or suggest a system or a method including receiving the control signal and producing a threshold selector signal based on the control signal, as recited in independent claims 4 and 7 and similarly recited in independent claims 1 and 10. An example of this feature is described in Applicant's specification at, for example, pages 4, 5 and 24-26.

Barthel, at col. 6, lines 43-67 and col. 7, lines 1-4 and Fig. 3, really discloses a binary/quantized image formed by recognizing regions of text and discarding all other nontext regions with the use of a horizontal and vertical Sobel filter and a Laplace filter. The edge activity determined is compared with a minimum activity value and, if it falls below this

value, is set equal to zero. The average edge activity and maximum edge activity, as well as the variance of the inner region, are determined in a step subsequently tested to see whether the average edge activity as well as the maximum edge activity are above the specified minimum or below a maximum value. The resulting regions are classified as either foreground or background regions accordingly.

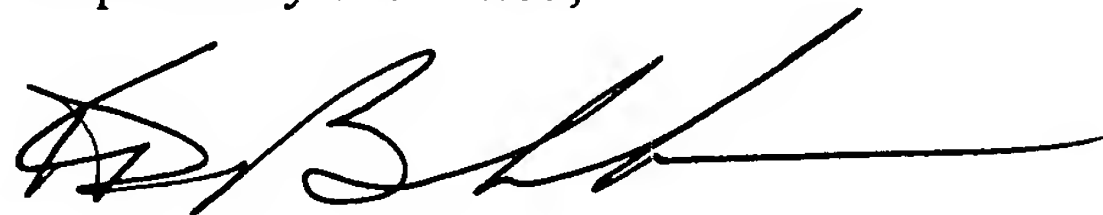
However, Barthel fails to disclose production of a threshold selector signal based on a control signal, as featured in independent claims 1, 4, 7 and 10.

In accordance with the above remarks, Applicants respectfully submit that independent claims 1, 4, 7 and 10 define patentable subject matter. Claims 2, 3, 5, 6, 8, 9, 11 and 12 each depend from one of claims 1, 4, 7 and 10, respectively, and therefore, as well as for the additional features they recite, also define patentable subject matter. Thus, Applicants respectfully request that the Examiner withdraw the rejections.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-12 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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